

EXHIBIT 1

Meet-and-Confer Correspondence With Counsel for Defense
July 29, 2025 – July 30, 2025
[Prior Correspondence and
Attachments Deleted in Printing]

From: [William Coffield](#)
To: [Michaels, Steven \(CRM\)](#); adamfee@paulhastings.com; sara@kmlawfirm.com; llustberg@gibbonslaw.com; zach@agilawgroup.com
Cc: paulgross@paulhastings.com; Laina Lopez; amarino@gibbonslaw.com; kjanukowicz@gibbonslaw.com; daniela@agilawgroup.com; [Liolos, John \(CRM\)](#); [Mezzanotte, John \(USANJ\)](#); [Nacional, Madeleine \(CRM\)](#); [Jackson, Jordan \(CRM\)](#)
Subject: [EXTERNAL] RE: U.S. v. Haghighat et al, No. 25-CR-339 (D.N.J.) -- Filter Team Proposed Order
Date: Wednesday, July 30, 2025 4:40:57 PM

Steven:

Defendants do not oppose the procedure set out in the proposed order. We continue to reserve all rights. Thank you.

Best,
Bill

Bill Coffield
Partner, Berliner Corcoran & Rowe LLP
(703) 608-5975 (mobile)



From: Michaels, Steven (CRM) <Steven.Michaels@usdoj.gov>
Sent: Wednesday, July 30, 2025 9:42 AM
To: adamfee@paulhastings.com; William Coffield <wcoffield@bcrlaw.com>; sara@kmlawfirm.com; llustberg@gibbonslaw.com; zach@agilawgroup.com
Cc: paulgross@paulhastings.com; Laina Lopez <llopez@bcrlaw.com>; amarino@gibbonslaw.com; kjanukowicz@gibbonslaw.com; daniela@agilawgroup.com; Liolos, John (CRM) <John.Liolos@usdoj.gov>; Mezzanotte, John (USANJ) <John.Mezzanotte@usdoj.gov>; Nacional, Madeleine (CRM) <Madeleine.Nacional@usdoj.gov>; Jackson, Jordan (CRM) <Jordan.Jackson@usdoj.gov>
Subject: RE: U.S. v. Haghighat et al, No. 25-CR-339 (D.N.J.) -- Filter Team Proposed Order

Dear all:

Thank you to defense counsel who responded to the message below and my voicemails and calls. As I have communicated to some of you, I will be holding our motion further, anticipating a filing this evening after 8 p.m. or tomorrow; please feel free to respond to this email or to call me anytime with any questions or comments that you may have.

Please also find attached, in a Winzip folder, Company-1's/Company-2's privilege log for the 17 items over which they are claiming privilege in part. We do not presently anticipate submitting the log to the Court in our on-the-docket motion or as a sealed filing, but we are providing it to the Prosecution Team and defense for your information.

We received this after-hours yesterday, and are forwarding it now.

I also re-attach my transmittal of yesterday with its attachments as well for convenience.

As I've noted, these types of motions are typically unopposed by the defense and hopefully we can file this one that way too.

Best regards,

Steve

Steven S. Michaels
Trial Attorney, Special Matters Unit
Criminal Division, Fraud Section
U.S. Department of Justice
(202) 615 1483 (mobile)

From: Michaels, Steven (CRM)
Sent: Tuesday, July 29, 2025 2:06 PM
To: adamfee@paulhastings.com; wcoffield@bcrlaw.com; sara@kmlawfirm.com; llustberg@gibbonslaw.com; zach@agilawgroup.com
Cc: paulgross@paulhastings.com; llopez@bcrlaw.com; amarino@gibbonslaw.com; kjanukowicz@gibbonslaw.com; daniela@agilawgroup.com; Liolos, John (CRM) <John.Liolos@usdoj.gov>; Mezzanotte, John (USANJ) <John.Mezzanotte@usdoj.gov>; Nacional, Madeleine (CRM) <Madeleine.Nacional@usdoj.gov>; Jackson, Jordan (CRM) <Jordan.Jackson@usdoj.gov>
Subject: RE: U.S. v. Haghighat et al, No. 25-CR-339 (D.N.J.) -- Filter Team Proposed Order

Dear Counsel:

Please find attached a further revised Proposed Order, together with a redline against the

original version circulated last Thursday. The additional changes today are to address typos in the caption as well as the numbers of documents to be released in unredacted form under the steps being requested by the Filter Team's motion. Company-1's and Company-2's counsel has provided revised assertions that reduces that number to 17.

We have also, at the request of Company-1/Company-2, adjusted the Rule 502(d) no-waiver language to accord with the Court's 502(d) orders in the *Gupta* matter (attached).

To give you additional time to consider this form of Proposed Order, the Filter Team will be delaying its filing until mid-afternoon tomorrow. Kate of Gibbons kindly called yesterday and I understand defendant Sabzevari does not oppose the relief sought, but as there have been revisions to the Proposed Order I would ask her or Larry to confirm.

I am hopeful the Filter Team motion can ultimately be filed unopposed by all defendants and thus also look forward to hearing from counsel from the other four defendants soon.

At this point, at issue are 17 documents containing redactions requested by Company-1/Company-2; our motion would allow you and the Prosecution Team to see the redacted material subject to restrictions requiring further *in camera* procedures prior to public use.

We look forward to hearing from you.

Best regards,

Steve

Steven S. Michaels
Trial Attorney, Special Matters Unit
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(202) 615 1483 (mobile)